

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

ELMER HEISNER, Individually, and on	)	
Behalf of JAYNE HEISNER	)	
	)	
Plaintiff,	)	Case No.: 08 C 593
v.	)	
	)	Judge David H. Coar
GENZYME CORPORATION,	)	
a Massachusetts Corporation	)	Magistrate Judge Denlow
	)	
Defendant.	)	

MOTION FOR VOLUNTARY OF DISMISSAL

Plaintiff, ELMER HEISNER, Individually and on behalf of JAYNE HEISNER,  
Moves this Court Extend the deadline for Plaintiff to file a second amended  
complaint until 7 days after this court rules on Plaintiff's pending Motion for  
Voluntary Dismissal and in support thereof states:

1. On July 25, 2008 this Court entered an Order Dismissing Plaintiff's  
Complaint without prejudice and giving plaintiff leave of Court to file a  
second amended complaint on or before August 18, 2008.
2. On August 15, 2008 Plaintiff filed a Motion for Voluntary Dismissal  
Without Prejudice.
3. In the interest of fairness and judicial economy plaintiff is requesting an  
extension to file the second amended complaint until 7 days after the  
Motion for Voluntary Dismissal Without Prejudice is ruled on. Defendant  
is not unduly prejudiced by the court granting this extension.

WHEREFORE, Plaintiff, ELMER HEISNER, Individually and on behalf of JAYNE HEISNER, Moves this Court Extend the deadline for Plaintiff to file a Second Amended Complaint until 7 days after this court rules on Plaintiff's pending Motion for Voluntary Dismissal.

Dated: August 18, 2008

Respectfully submitted,

COUNSEL FOR PLAINTIFF  
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**CERTIFICATE OF SERVICE**

I do hereby certify that, on this 18<sup>th</sup> day of August, 2008, a true and correct copy of **Plaintiff, Elmer Heisner's, individually, and on Behalf of Jayne Heisner, Motion for Extension of Time** was served via Electronic Court Filing on the following:

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